

APPENDIX A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ADVANCED MEMORY TECHNOLOGIES,
LLC,

Plaintiff,

v.

SK HYNIX INC.,

Defendant.

Case No. 2:24-CV-1078-JRG-RSP

JURY TRIAL DEMANDED

REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE (JAPAN)

In conformity with Article 5 of the Vienna Convention on Consular Relations, Federal Rules of Civil Procedure 26(b)(1) and 28(b)(1), 28 U.S.C. § 1651, and 28 U.S.C. § 1781(b), the undersigned judicial authority has the honor to submit this request on behalf of Defendant SK hynix Inc. (“SK hynix”) in the above-captioned action.

The United States District Court for the Eastern District of Texas, by and through the Honorable Judge J. Rodney Gilstrap, United States District Court Judge, presents its compliments to the judicial authorities of Japan, and requests international judicial assistance to obtain evidence to be used in a civil proceeding before this court in the above-captioned matter.

This court requests the assistance of the Courts of Japan to compel Seiko Instruments Inc. (“Seiko”), a Japanese corporation, to provide the requested documentary and testimony evidence to the appropriate authority designated by the judicial authorities of Japan for this purpose.

This court requests the assistance described herein as necessary in the interests of justice. Below are the names of, and contact information for, all parties and their respective legal representatives:

Party	Legal Representatives
PLAINTIFF: Advanced Memory Technologies, LLC c/o legal representatives	Justin A. Nelson Texas State Bar No. 24034766 SUSMAN GODFREY LLP 1000 Louisiana Street, Suite 5100 Houston, Texas 77002 Telephone: (713) 651-9366 Facsimile: (713) 654-6666 jnelson@susmangodfrey.com
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Party	Legal Representatives
DEFENDANT: SK hynix Inc. c/o legal representatives	Sean Pak (CA Bar No. 219032) QUINN EMANUEL URQUHART & SULLIVAN, LLP 50 California Street, 22nd Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Fax: (415) 875-6700 Email: seanpak@quinnmanuel.com
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Party	Legal Representatives
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REPRESENTATIVE TO ACT AS CONTACT:

Should correspondence in this matter be required, contact should be made through the following individuals:

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ENTITY FROM WHOM EVIDENCE IS REQUIRED:

Seiko Instruments Inc.
8, Nakase 1-chome, Mihama-ku, Chiba-shi, Chiba 261-8507, Japan

It has been represented to this court that Seiko Instruments Inc. is a corporation registered under the laws of Japan.

SUBJECT MATTER AND RELATIVITY OF THIS REQUEST:

It has been represented to this court that this request is made in connection with Case No. 2:23-cv-274-JRG-RSP, in which Plaintiff Advanced Memory Technologies, LLC (“AMT”)

contends that Defendant SK hynix infringed five AMT patents, including U.S. Patent Nos. 7,777,557 (the ““557 patent”), 7,920,018 (the ““018 patent”), 7,969,231 (the ““231 patent”), 8,593,888 (the ““888 patent”), and 8,400,835 (the ““835 patent”) (collectively, “the Asserted Patents). In defense against AMT’s claims, SK hynix asserts, *inter alia*, that it does not infringe any of the Asserted Patents and that the Asserted Patents are invalid.

In order to present that the Asserted Patents are invalid and unenforceable, SK hynix seeks certain documents and testimony from Seiko for use at trial relevant to their products, including the S-24C02BMFN 2K EEPROM product, that existed at the time of the invention for the Asserted Patents. Attached as **Exhibit A** is a request for production of certain documents for use at trial that SK hynix believes are likely to be in the possession, custody, or control of Seiko. To further clarify the evidence sought for use at trial, attached as **Exhibit B** is an outline of the topics and issues about which counsel for SK hynix intend to inquire of Seiko.

In view of the foregoing, it is therefore requested, in the interest of justice, that the appropriate judicial authority of Japan issue an order, in accordance with the laws and procedures of the Courts of Japan, summoning Seiko to appear before the designated authority to provide the documentary evidence and testimony as requested by the below-signed judicial authority.

When required, the below-signed judicial authority shall provide reciprocal assistance, such as requested herein, to the appropriate judicial authorities of Japan.

SK hynix’s legal representatives at Quinn Emanuel Urquhart & Sullivan, LLP (contact information listed above), stand ready and willing to reimburse the appropriate judicial authorities in Japan, for all costs incurred in executing the below-signed judicial authority’s request for international judicial assistance.

WITNESS, the Honorable Judge J. Rodney Gilstrap, Judge of the United States District Court for the Eastern District of Texas, this _____ day of _____, 2025.

Signature and Seal of Requesting Authority:

Hon. J. Rodney Gilstrap
United State District Court
Eastern District of Texas